

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	
)	
Plaintiff,)	C.A. No. 16-122-LPS
)	
v.)	JURY TRIAL DEMANDED
)	
GROUPON, INC.)	
)	
Defendant.)	

**PLAINTIFF’S MOTION FOR LEAVE TO
FILE AN AMENDED COMPLAINT**

Plaintiff International Business Machines Corporation (“IBM”) respectfully moves for leave to file an Amended Complaint to add LivingSocial, Inc. as a party to this action. The grounds for this motion are set forth in IBM’s letter brief submitted herewith.

Pursuant to D. Del. LR 15.1, a copy of the Amended Complaint is attached hereto as Exhibit 1, and a document showing a redline of the amendments against the prior pleading is attached as Exhibit 2. Pursuant to D. Del. LR 7.1.1, counsel for the parties conferred, and Defendant will oppose this Motion.

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

John M. Desmarais
Jon T. Hohenthanner
Karim Oussayef
Laurie N. Stempler
Robert C. Harrits
Michael J. X. Matulewicz-Crowley
Brian D. Matty
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: (212) 351-3400

Dated: May 19, 2017
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By: /s/ David E. Moore
David E. Moore (#3983)
Bindu A. Palapura (#5370)
Stephanie E. O'Byrne (#4446)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
sobyne@potteranderson.com

*Attorneys for Plaintiff International Business
Machines Corporation*

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[PROPOSED] ORDER

At Wilmington this ____ day of _____, 2017, having considered
Plaintiff's Motion for Leave to File an Amended Complaint;

IT IS HEREBY ORDERED that the Motion for Leave is GRANTED.

Leonard P. Stark, Chief Judge